

[Submitting Counsel on Signature Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION**

No. 3:23-md-03084-CRB

**STIPULATION REGARDING PROPOSED
FINAL ESI PROTOCOL**

This Document Relates to:

ALL ACTIONS

WHEREAS, on April 23, 2024, the Court entered an Order resolving the parties' outstanding ESI Protocol Disputes. ECF No. 511.

WHEREAS, the Court addressed the parties' disagreements as presented in their Joint Discovery Letter (ECF No. 499) and ordered them to incorporate its rulings from PTO No. 9 (ECF No. 345) and its April 23 Order (ECF. No. 511) into a final Stipulated and [Proposed] ESI Protocol.

WHEREAS, the parties have conferred and agreed to the attached Proposal.

THEREFORE, the parties respectfully request the Court enter the parties' Final Stipulated ESI Protocol.

IT IS SO STIPULATED.

1 Dated: April 30, 2024

Respectfully submitted,

2 By: /s/ Sarah R. London

3 Sarah R. London (SBN:
4 267083)

5 **LIEFF CABRASER HEIMANN &
6 BERNSTEIN, LLP**

7 275 Battery Street, 29th Floor
8 San Francisco, CA 94111-3339
9 Telephone: (415) 956-1000
10 Facsimile: (415) 956-1008
11 slondon@lchb.com

12 By: /s/ Rachel B. Abrams

13 Rachel B. Abrams (SBN
14 209316)

15 **PEIFFER WOLF CARR KANE
16 CONWAY & WISE, LLP**

17 555 Montgomery Street, Suite 820
18 San Francisco, CA 94111
19 Telephone: (415) 426-5641
20 Facsimile: (415) 840-9435
21 rabrams@peifferwolf.com

22 By: /s/ Roopal P. Luhana

23 Roopal P. Luhana

24 **CHAFFIN LUHANA LLP**

25 600 Third Avenue, 12th Floor
26 New York, NY 10016
27 Telephone: (888) 480-1123
28 Facsimile: (888) 499-1123
luhana@chaffinluhana.com

Co-Lead Counsel for Plaintiffs

1
2 Dated: April 30, 2024

By: /s/ Michael B. Shortnacy
Michael B. Shortnacy

3
4 MICHAEL B. SHORTNACY (SBN:
277035)
5 mshortnacy@shb.com
6 **SHOOK, HARDY & BACON, L.L.P.**
2049 Century Park East, Suite 3000
7 Los Angeles, CA 90067
Telephone: (424) 285-8330
8 Facsimile: (424) 204-9093

9 PATRICK OOT (*Pro Hac Vice* admitted)
oot@shb.com
10 **SHOOK, HARDY & BACON, L.L.P.**
1800 K St. NW, Suite 1000
11 Washington, D.C. 20006
Telephone: (202) 783-8400
12 Facsimile: (202) 783-4211

13 JEREMIAH S. WIKLER (*Pro Hac Vice*
14 admitted)
jwikler@shb.com
15 **SHOOK, HARDY & BACON, L.L.P.**
2555 Grand Blvd.
16 Kansas City, MO 64108
Telephone: (816) 474-6550
17 Facsimile: (816) 421-5547

18
19 By: /s/ Randall S. Luskey
20 Randall S. Luskey

21 RANDALL S. LUSKEY
rluskey@paulweiss.com
22 **PAUL, WEISS, RIFKIND, WHARTON
& GARRISON LLP**
535 Mission Street, 24th Floor
23 San Francisco, CA 94105
Telephone: (628) 432-5100
24 Facsimile: (628) 232-3101

25 ROBERT ATKINS (*Pro Hac Vice*
26 admitted)
ratkins@paulweiss.com
27 CAITLIN E. GRUSAUSKAS (*Pro Hac*
Vice admitted)
cgrusauskas@paulweiss.com
28 ANDREA M. KELLER (*Pro Hac Vice*

admitted)
akeller@paulweiss.com
**PAUL, WEISS, RIFKIND, WHARTON
& GARRISON LLP**
1285 Avenue of the Americas
New York, NY 10019
Telephone: (212) 373-3000
Facsimile: (212) 757-3990

Attorneys for Defendants
UBER TECHNOLOGIES, INC.,
RASIER, LLC, and RASIER-CA, LLC

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CERTIFICATE OF SERVICE

I hereby certify that on April 30, 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically send notification of the filing to all counsel of record.

Dated: April 30, 2024

By: /s/Roopal P. Luhana
Roopal P. Luhana

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION**

No. 3:23-md-03084-CRB

**[PROPOSED] ORDER REGARDING
FINAL ESI PROTOCOL**

This Document Relates to:

ALL ACTIONS

The Court hereby GRANTS the parties' Joint Proposed ESI Protocol.

IT IS SO ORDERED.

Date: _____, 2024

HON. LISA J. CISNEROS
UNITED STATES MAGISTRATE JUDGE